

1 Richard H. Poulson (SBN: 178479)
LAW OFFICE OF RICHARD H. POULSON
2 The Mansard Building
2233 Santa Clara Avenue, Suite 3
3 Alameda, California 94501
Telephone: (510) 747-8034
4 E-mail: rich@richardpoulsonlaw.com

5 Attorneys for Defendant
SAMEER PADHYE

6
7 **UNITED STATES DISTRICT COURT**
8 **NORTHERN DISTRICT OF CALIFORNIA**

9 NATIONAL SPECIALTY PHARMACY, LLC,

10 Plaintiff,

11 v.

12 SAMEER PADHYE,

13 Defendant.

Case No.: 5:23-CV-4357-NW

**DECLARATION OF RICHARD H.
POULSON IN SUPPORT OF DEFENDANT
SAMEER PADHYE'S NOTICE OF
MOTION AND MOTION PURSUANT TO
28 U.S.C. § 1927 FOR SANCTIONS**

TIME: September 3, 2025
DATE: 9:00 A.M.
LOCATION: COURTROOM 3
5TH FLOOR
U.S. DISTRICT COURT
SAN JOSE, CALIFORNIA

Trial Date: September 15, 2025

1 I, Richard H. Poulson, am counsel of record in this matter and state the following to the best of
2 my knowledge:

3 1. Attached hereto as Exhibit A is a true and correct copy of the relevant excerpts of the
4 deposition testimony of Sameer Padhye taken on December 6, 2024.

5 2. Attached hereto as Exhibit B is a true and correct copy of the relevant excerpts of the
6 deposition testimony of Sanjiv Dhawan taken on December 11, 2024.

7 3. Attached hereto as Exhibit C is a true and correct copy of the relevant excerpts of the
8 deposition testimony of Sanjiv Dhawan as National Specialty Pharmacy, LLC's corporate
9 representative taken on December 11, 2024. To the extent references in the accompanying motion to
10 Exh. C concern pages 59 or higher, they are mislabeled and actually refer to Exh. D.

11 4. Attached hereto as Exhibit D is a true and correct copy of the relevant excerpts of the
12 deposition testimony of Sanjiv Dhawan as National Specialty Pharmacy, LLC's corporate
13 representative taken on December 12, 2024.

14 5. Attached hereto as Exhibit E is a true and correct copy of Plaintiff National Specialty
15 Pharmacy, LLC's Responses to Defendant Sameer Padhye's Request for Answers to Interrogatories,
16 Set One, served on August 30, 2024.

17 7. Attached hereto as Exhibit F is a true and correct copy of Plaintiff National Specialty
18 Pharmacy, LLC's Amended Responses to Defendant Sameer Padhye's Requests for Answers to
19 Interrogatories, Set One, served on November 4, 2024.

20 8. Attached hereto as Exhibit G is a true and correct copy of Plaintiff National Specialty
21 Pharmacy, LLC's Amended Responses to Defendant Sameer Padhye's Requests for Answers to
22 Interrogatories, Set One, served on December 4, 2024.

23 9. Attached hereto as Exhibit H is a true and correct copy of Plaintiff National Specialty
24 Pharmacy, LLC's Amended Responses to Defendant Sameer Padhye's Requests for Answers to
25 Interrogatories, Set One, served on December 9, 2024.

26 10. Attached hereto as Exhibit I is a true and correct copy of an e-mail from Nitaj P. Singh
27 to Richard H. Poulson dated December 11, 2024.

28 11. Attached hereto as Exhibit J is a letter from Richard H. Poulson to Nitaj P. Singh dated

1 October 24, 2024.

2 14. Attached hereto as Exhibit K is a true and correct copy of an e-mail from Nitoh P. Singh
3 to Richard H. Poulson dated October 31, 2024.

4 16. As of the date of this filing, Mr. Padhye has incurred \$38,356.16 in costs and fees,
5 including attorney's fees at the rate of \$435 an hour; paralegal fees at the rate of \$150 an hour; as well
6 as deposition and electronic discovery vendor fees. I used Clio.com to manage firm invoices and
7 expect these costs to rapidly increase as the case progresses.

8 DATED: June 9, 2025

LAW OFFICE OF RICHARD H. POULSON

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11 By: /s/ Richard H. Poulson
12 RICHARD H. POULSON
13 Attorney for Defendant
14 SAMEER PADHYE
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